

**REPORTS ANALYSIS REFERRAL
TO
OFFICE OF GENERAL COUNSEL**

DATE: August 8, 2007

ANALYST: Christopher A. Whyrick

- I. COMMITTEE:** Committee to Elect Sekhon for Congress
C00427229
Daljit Kaur Sekhon, Treasurer
1085 Gray Avenue
Yuba City, CA 95991
- II. RELEVANT STATUTE:** 11 CFR §100.12
11 CFR §104.7(b)(1)(i)
11 CFR §104.7(b)(1)(B)
11 CFR §104.7(b)(2)
11 CFR §104.7(b)(4)(i)
2 U.S.C § 434 (b)(3)(A)

III. BACKGROUND:

**Failure to Provide the Contributor Information for Contributions from
Individuals**

The Committee to Elect Sekhon for Congress ("the Committee") failed to provide the contributor information for 217 of 244, or eighty-nine percent (89%), of the contributions from individuals during the 2005-2006 election cycle (Attachment 2).

2006 October Quarterly Report

On October 18, 2006, the Committee filed the 2006 October Quarterly Report covering the reporting period of July 1, 2006 through September 30, 2006 (Image 26039230866). Schedule A (Itemized Receipts) of the report failed to provide the contributor information for 2 of 10, or twenty percent (20%), of the contributors.

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2006 12 Day Pre-General Election Report

On October 26, 2006, the Committee filed the 2006 12-Day Pre-General Election Report covering the reporting period of October 1, 2006 through October 18, 2006 (Image 26940541028). Schedule A (Itemized Receipts) of the report failed to provide the contributor information for 154 of 155, or ninety-nine percent (99%), of the contributions.

2006 30-Day Post General Election Report

On December 7, 2006, the Committee filed the 2006 30-Day Post-General Election Report covering the reporting period of October 19, 2006 through November 27, 2006 (Image 26940818070). Schedule A (Itemized Receipts) of the report failed to provide the contributor information for 74 of 74, or one-hundred percent (100%), of the contributions.

On April 27, 2007 and May 1, 2007, two RFAs were sent to the Committee regarding the 12-Day Pre-General Election Report covering the reporting period of October 1, 2006 through October 18, 2006 (Image 27039433005) and the 30-Day Post-General Election Report covering the reporting period of October 19, 2006 through November 27, 2006 (Image 27039433621), respectively. The RFAs requested that the Committee file amendments to include the missing contributor information and/or a detailed description of their "best efforts to obtain the information." The due dates for these responses were May 29, 2007 and June 1, 2007, respectively.

On June 10, 2007, a RAD Analyst telephoned the Committee and left a message for the treasurer stating that amendments were needed regarding the "best efforts" of the Committee (Attachment 3).

On June 13, 2007, the RAD Analyst successfully contacted the treasurer, Daljit Sekhon, and inquired as to why the Committee had not responded to RFAs for the 2006 12-Day Pre-General Election covering the reporting period of October 1, 2006 through October 18, 2006 and 30-Day Post-General Election reports covering the reporting period of October 19, 2006 through November 27, 2006. The Analyst expressed to Ms. Sekhon that the Committee had received letters concerning "best efforts" issues and had failed to file any corresponding amendments. Ms. Sekhon stated that she had filed all mandatory reports in a timely manner. The Analyst responded that indeed the Committee had filed the original reports in a timely manner, but failed to file amendments in response to the RFAs. Ms. Sekhon stated she never received these RFAs and the Analyst verified the correct committee address was on file. Ms. Sekhon requested the Analyst fax her copies of the RFA's. The Analyst complied with the request and stated that Ms. Sekhon may contact him when she receives them. The Analyst ended the conversation by saying that an adequate response concerning deficient

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occupation/employer entries would need to be received by the Commission on or before June 25, 2007 (Attachment 3).

On June 23, 2007, the Committee's report preparer, Pradeet Venigella, telephoned the RAD Analyst concerning the outstanding RFAIs. He said that he was handed the RFAIs by the treasurer and had problems interpreting them. The RAD Analyst expressed to Mr. Venigella that there is currently an outstanding OGC referral concerning contributor entries lacking sufficient disclosure information. The Analyst identified the entries containing the occupation "self" and employer "self." The Analyst advised Mr. Venigella that reporting "self" and "self" is not acceptable, as the contributor must have a profession, unless the individual is unemployed. Mr. Venigella stated that the majority of contributors are self-employed. The Analyst replied that the Committee is required to obtain and disclose the occupation of all contributors. The Analyst further explained that in the instance where an individual is a self-employed doctor, it is necessary to disclose the employer as "self" and the occupation as "doctor." Mr. Venigella stated that he understood, and would correct the omitted information. The Analyst expressed to Mr. Venigella that the FEC required a response to the outstanding OGC referable items no later than June 25, 2006. The Analyst and Mr. Venigella also discussed other outstanding issues that had been addressed on these RFAI's, including excessive and prohibited contributions. Mr. Venigella said that he would send in the amendments as soon as possible (Attachment 3).

On June 26, 2007, Mr. Venigella, telephoned the RAD Analyst concerning his inability to upload the Amended 2006 12-Day Pre-General Election Report covering the reporting period of October 1, 2006 through October 18, 2006 and 30-Day Post-General Election Report covering the reporting period of October 19, 2006 through November 27, 2006. The RAD Analyst assisted Mr. Venigella in uploading the reports successfully (Attachment 3).

On June 26, 2007 the Committee filed an Amended 2006 12-Day Pre-General Election Report covering the reporting period of October 1, 2006 through October 18, 2006 (Image 27990180769) and 30-Day Post-General Election Report covering the reporting period of October 19, 2006 through November 27, 2006 (Image 27930854888). Schedule A (Itemized Receipts) of the Amended 12-Day Pre-General Election Report failed to provide the contributor information for 149 of 162, or ninety two percent (92%), of the contributions. Schedule A (Itemized Receipts) of the Amended 30-Day Post-General Election Report failed to provide the contributor information for 66 of 72, or ninety two percent (92%), of the contributions.

On June 26, 2007, the RAD Analyst placed a call to Mr. Venigella concerning the newly uploaded amendments. The Analyst stated that the Committee failed to adequately correct the required "best efforts" information. Mr. Venigella expressed that he was under the impression that all that was required of him was to remedy the outstanding excessive and prohibited

contributions. The Analyst reviewed and highlighted the June 23, 2007 conversation. Mr. Venigella stated that he felt that the true violation was the excessive issues. The Analyst stated that correcting the excessive violations was also important; however, the committee still needed to provide the "best efforts" documentation requested. The Analyst once again reiterated to Mr. Venigella that the Committee had until June 28, 2007 to supply the necessary information (Attachment 3).

No further communications have been received from the Committee regarding these matters.

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SEKHON, ARJINDERPAL SINGH

ID #H4CA02072

COMMITTEE TO ELECT SEKHON FOR CONGRESS
DALJIT KAUR SEKHON
FILING FREQUENCY: QUARTERLY

1085 GRAY AVE

YUBA CITY

HOUSE
CA 95691

ID #C00427228

FORM	TYPE	RPT	TYPE	AI	PGI	REC	DATE	PGS	BEG	IMAGE	COVERAGE	DATES	BEG	CASH	RECEIPTS	DISBURSE	END	CASH	DEBTS	BY		
NS				P		2/15/2007		2	27039390389													
RQ		Q2		7		7/31/2007		2	27039493283		4/01/2007	8/30/2007										
3		Q1		N		4/24/2007		4	27890029622		1/01/2007	3/31/2007	13329		0	0	13329		0			
3		Q2		N		8/08/2007		5	27931054935		4/01/2007	8/30/2007	5029		0	0	5029		0			
													TOTAL		0	0						

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FORM	TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
1				N	8/08/2008	5	28039182555						
1				A	8/15/2008	5	28039184583						
NS				4	10/26/2008	2	28930519504						
NS				4	10/31/2008	2	28940570998						
NS				4	11/17/2008	2	28940594818						
NS				T	1/31/2007	8	27039383089						
RQ		12G	2		4/27/2007	7	27039433005	10/01/2008 10/18/2008					
RQ		30G	2		5/01/2007	7	27039433621	10/19/2008 11/27/2008					
RQ		YE	2		4/27/2007	4	27039433012	11/28/2008 12/31/2008					
RQ		YE	7		2/20/2007	2	27039392105	11/28/2008 12/31/2008					
3		Q3	N		10/18/2008	12	28039230886	7/01/2008 9/30/2008	0	8401	3660	4740	0
3		12G	N	G	10/26/2008	80	28940541028	10/01/2008 10/18/2008	0	136550	57333	79217	0
3		12G	A	G	8/26/2007	82	27990180769	10/01/2008 10/18/2008	0	116455	57271	59184	0
3		30G	N	G	12/07/2008	42	28940818070	10/19/2008 11/27/2008	79217	48631	94758	33090	0
3		30G	A	G	8/26/2007	42	27930854888	10/19/2008 11/27/2008	59184	35846	94203	927	0
3		YE	N		3/12/2007	9	27930239781	11/28/2008 12/31/2008	9227	5800	1698	13329	0
TOTAL										168602	156832		

Committee to Elect Sekhon for Congress (C00427229)
2005-2006 Election Cycle Contributor Best Efforts Overview

Report	Number of Inadequate Entries	Total Entries	Percentage Incorrect
2006 Q3	10	50	20%
2006 12G	154	155	99%
Amended 2006 12G, received	15	16	92%
2006 30G	74	74	100%
Amended 2006 30G, received	66	72	92%
Total from Q3, Amended 12G, and Amended 30G Reports	217	244	89%

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